Golden Temple

MEMO

Michael Gouveia, *Product Development Manager* - Golden Temple & Yogi Tea 2545 Prairie Road, Eugene, OR 97402 ● Phone 541-461-2160 ext 285 ● Fax 541-461-1633 Michael Gouveia@kiit.com

TO: The NOSB and Arthur Neal, Director, Program Administration, National Organic Program, USDA-AMS-TMO-NOP, 1400 Independence Ave., SW, Room 4008, So., Ag Stop 0268, Washington, DC 20250

SUBJECT: Docket TM-04-07 – Response Supporting Continued Use of Materials on the National List (NOP) 8/16/2005

The Golden Temple and Yogi Tea companies produce 153 organic products (5 are certified 100% Organic, 83 are Certified Organic and 65 are certified "Made with Organic Ingredients"). During our last fiscal year (July 2004 – June 2005) consumer purchases of our products throughout North America, enabled us to purchase, process, package and sell more than 11 million pounds (5500 tons) of certified organic raw material ingredients at a wholesale value of more than \$7.5 million.

On a global scale, since the late 1980's, the Yogi Tea company has been a pioneer in developing purchase contracts for the production and certification of organic herbs and spices where no supplies previously existed. We have since become a leader in North American and European sales of herbal teas in the natural foods marketplace, competing successfully against manufacturers of nonorganic herbal teas who also dominate the grocery mass market. The same is true for the rise of our granola and Peace Cereal products, which consumers consistently prefer for quality and flavor, and for their certified organic status. The materials we are advocating for continued use in organic processing are benign to the consumer and to the environment, and have been instrumental in enabling us to design organic products for the average consumer that compete successfully against comparable mass market, conventional grocery products.

Incorporating these various ingredients allowed on the National List, including natural flavors, has enabled us to produce organically certified products with flavor and texture profiles that have become extremely popular with consumers. We conduct intensive consumer test panel evaluations of consumer preferences for choosing the flavor and texture profiles in our product lines. There can be no doubt that the use of such ingredients has facilitated much greater consumption of organic products in the United States.

Based on our extensive market tests and consumer testimonials, if the use of these items on the National List were curtailed, there is no doubt that there would be a significant loss in consumer sales of organically certified products such as ours. This loss of business to us would then cascade into significant negative effects on our suppliers of organic ingredients, thereby resulting in a significant harm for the economic viability of organic agriculture.

For these reasons we solicit your continued support on the regulatory side, to allow us to continue the extremely challenging entrepreneurial effort to build a viable and profitable venue for the production and consumption of organic agricultural products within the United States.

08/16/05

Sincerely,

Michael Gouveia, Product Development Manager

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. The Golden Temple and Yogi Tea companies (certified organic by QAI, Inc.) support the continued allowance of the following substance(s):

Name of Substance	Location on National	Daniel Communication	1.9
maine of Substance		Reason for continued	Supporting
	List (ie. 205.605(a))	allowance.	Documents (example:
			research data or other
			international organic
			programs
Natural Flavors	205.605 (a)	Does no harm.	Consumer focus
		Consumer demand	group responses in
		results in vastly	product development
		increased reliance on	& review.
·		organic agriculture.	
Citric Acid	205.605 (a)	Benign & does no	Consumer focus
		harm. A simple	group responses in
		flavor enhancer that	product development
		brings our products	& review.
		onto competitive	
		footing with	
		conventional herbal	
		teas that dominate the	
		marketplace.	
Colors	205.605 (a)	Does no harm.	Consumer focus
		Consumer demand	group responses in
		for Organic extruded	product development
		grain products results	& review.
		in vastly increased	
		reliance on organic	
		agriculture.	

for Organic extruded grain products results in vastly increased reliance on organic agriculture. Ascorbic Acid 205.605 (b) Benign & does no harm. A simple flavor enhancer that brings our products onto competitive footing with conventional herbal teas that dominate the marketplace. Glycerin 205.605 (b) Does no harm. Glycerin / oil coating on raisins improves moisture retention in cereal products (better coating than oil alone). Dry, hard raisins are significant cause of serious tooth injuries. Tocopherols 205.605 (b) Does no harm. Consumer demand results in vastly increased reliance on organic agriculture. Rosemary extract in sufficient quantities causes distortion of product flavor profile rejected by consumers. Cornstarch (native) 205.606 (a) Does no harm in Made with OG products. We use OG Cornstarch in Certified OG products.	Sodium Bicarbonate	205 (05 (0)	D1 0 1 1	Ta
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enhances production flow and minimizes loss of powder from			powdered teabag ingredients that	involving
			enhances production flow and	
			minimizes loss of powder from	

08/16/05

Sincerely,

Michael Gouveia

Product Development Manager
Golden Temple and Yogi Tea Companies

Cc:

Organic Trade Association National Organic Standards Board

Submitted by Golden Temple & Yogi Tea companies 2545 Prairie Road, Eugene, Oregon 97405

FLAVORS

Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hum	ans or th	e enviro	
 Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3]. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517(c)(2)(A)i]. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)]. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1]. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5]. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5]. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2]. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)i; § 6518 m.4]. 		2227222		MANUFACTURE IS PROPRIE
Category 2. Is the substance	essential	for orga	nic prod	luction?
 Is the substance formulated or manufactured by a chemical process? [6502 (21)]. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]. Is the substance created by naturally occurring biological processes? [6502 (21)]. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)]. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)]. Is there any alternative substances? [§ 6518 m.6]. Is there another practice that would make the substance unnecessary? [§ 6518 m.6]. 	YES YES	20000		INTENSIVE FOCUS GROUPS OF CONSUMER VERIFY THAT MATERIT OF OLGANIC CONSUME WOULD NOT PURCHAS WITHOUT THESE FLAVO IN MARY OF OUR PRODU
Category 3. Is the substance compat	ible with	organic	product	ion practices?
 Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)]. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7]. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories: 	AES AES	No	·	
Question	Yes	No	N/A¹	Documentation (TAP; petition; regulatory agency: other)
a. copper and sulfur compounds; b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? d. livestock parasiticides and medicines? e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		22220		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A--not applicable.

Submitted by Golden Temple & Yogi Tea companies CITRIC ACID
2545 Prairie Road, Eugene, Oregon 97405

Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hum	ans or th	ne enviror	
 Is there environmental contamination during manufacture, use, misuse, or disposal? [§6518 m.3]. 		No .		OUR KNOWLEDGE
 Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517(c)(2)(A)ii]. 		No		OUR KNOWLEDGE
 Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)]. 		No		
 Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1]. 		NO		
Are there adverse biological and chemical interactions in agro-eco- system? [§ 6518 m.5].		No		
Are there detrimental physiological effects on soil organisms, crops, or livestock? [§6518 m.5].	!	No		
Is there a toxic or other adverse action of the material or its break- down products? [§ 6518 m.2].		No		
 Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. 		No		
9. Is there any harmful effect on human health? [§6517c(1)(A)(i); 6517c(2)(A)i; §6518 m.4].		No		
Category 2. Is the substance of	essentia	for orga	nic produ	ection?
[3 3 3 1 3 (1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(1)(YES NO YES YES Ible with	No organic	productio	on practices?
Question	Yes	No	N/A¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds; b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? d. livestock parasiticides and medicines? e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		22222		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable

Submitted by Golden Temple & Yogi Tea companies 2545 Prairie Road, Eugene, Oregon 97405



Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hum	ans or th	le enviro	
 Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3]. 		NO .		OUR KNOWLEDGE
 Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517(c)(2)(A)i]. 		No		OUR KNOWLEDGE
 Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)]. 		NO		
 Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1]. 		NO		
Are there adverse biological and chemical interactions in agro-eco- system? [§ 6518 m.5].		No		
 Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5]. 		No		
7. Is there a toxic or other adverse action of the material or its break-down products? [§ 6518 m.2].	!	No		
 Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. 		No		
9. Is there any harmful effect on human health? [§6517c(1)(A)(i); 6517c(2)(A)i; §6518 m.4].		No		
Category 2. Is the substance	essential	for orga	nic proc	luction?
 Is the substance formulated or manufactured by a chemical process? [6502 (21)]. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]. Is the substance created by naturally occurring biological processes? [6502 (21)]. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)]. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)]. Is there any alternative substances? [§ 6518 m.6]. Is there another practice that would make the substance unnecessary? [§ 6518 m.6]. Category 3. Is the substance compating forming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(iii)]. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7]. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories: 	YES YES ible with YES YES	No No No organic	product	ion practices?
Question	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds; b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? d. livestock parasiticides and medicines? e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		22222		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A-not applicable.

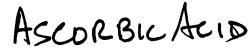
Submitted by Golden Temple & Yogi Tea companies Sodium BICARBONATE 2545 Prairie Road, Eugene, Oregon 97405



Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hum	ans or th	e enviror	
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 [§ 6517c(1)(B)(ii)]. 4. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1]. 5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5]. 6. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5]. 7. Is there a toxic or other adverse action of the material or its break- 		20000		
down products? [§ 6518 m.2]. 8. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. 9. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A)i; § 6518 m.4].		N0 N0		
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Category 3. Is the substance compat	tible with	organic	production	on practices?
 Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)]. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7]. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories: 	YES	No		
Question	Yes	No	N/A¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds; b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? d. livestock parasiticides and medicines? e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		22222		

If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A-not applicable.

Submitted by Golden Temple & Yogi Tea companies 2545 Prairie Road, Eugene, Oregon 97405



Question	Yes	No	N/A 1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hum	ans or th	ne enviro	-
 Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3]. 		No .		OUR KNOWLEDGE
2. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517(c)(2)(A)i].		No		OUIZ FROMCEDOE
3. Does the substance contain List 1, 2, or 3 inerts? [§6517c(1)(B)(ii)].		No		
 Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1]. 		NO		
Are there adverse biological and chemical interactions in agro-eco- system? [§ 6518 m.5].		No		
 Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5]. 		No		
7. Is there a toxic or other adverse action of the material or its break-down products? [§ 6518 m.2].		No		
 Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. 	 	No		
9. Is there any harmful effect on human health? [§6517c(1)(A)(i); 6517c(2)(A)i; §6518 m.4].		No		
Category 2. Is the substance	essentia	for orga	nic proc	luction?
 Is the substance formulated or manufactured by a chemical process? [6502 (21)]. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]. Is the substance created by naturally occurring biological processes? [6502 (21)]. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)]. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)]. Is there any alternative substances? [§ 6518 m.6]. Is there another practice that would make the substance unnecessary? [§ 6518 m.6]. Category 3. Is the substance compared.	Yes Yes Yes	No	product	ion practices?
Is the substance consistent with organic farming and handling?	YES	organic	product	ion practices:
 [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)]. 2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7]. 3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories: 	YES	No		
Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
 a. copper and sulfur compounds; b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? d. livestock parasiticides and medicines? e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners? 		22222		

¹ If the substance under review is for crops or livestock production, all of the questions from 205,600(b) are N/A-not applicable.

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Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hun	nans or th	e enviro	nment?
1. Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3].		No -		TO THE BEST OF
 Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517(c)(2)(A)ii. 		No		OUR KNOWLEDGE
 Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)]. 		No		
 Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m. 1]. 		NO		
 Are there adverse biological and chemical interactions in agro-eco- system? [§ 6518 m.5]. 		No	i	
 Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5]. 		No		
 Is there a toxic or other adverse action of the material or its break- down products? [§ 6518 m.2]. 		NO		
 Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. 		NO		
9. Is there any harmful effect on human health? [§6517c(1)(A)(i); 6517c(2)(A)i; §6518 m.4].		No		
Category 2. Is the substance	essentia	l for orga	nic prod	luction?
Is the substance formulated or manufactured by a chemical proc- ess? [6502 (21)].	YES			COSTING OR
 is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]. 	YES			RAISINS WITH
3. Is the substance created by naturally occurring biological processes? [6502 (21)].		No		GLYCERINBON
4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)]. 5. Is the substance used in handling, not synthetic, but not organi-		NO		IN CENEER PRODUCTS
cally produced? [§ 6517c(1)(B)(iii)].		NO		NECESSARY TO MINI
6. Is there any alternative substances? [§ 6518 m.6].7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6].		MO		SERIOUS CONSUMER TOOTH INJURIES
Category 3. Is the substance compa	tible with	.	producti	
1. Is the substance consistent with organic farming and handling? [§6517c(1)(A)(iii); 6517c(2)(A)(ii)].	YES			
2. Is the substance compatible with a system of sustainable agri-	YES		1	
culture? [§ 6518 m.7]. 3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:	100	No		
Question	Yes	No	N/A¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		100		
b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated		No		
seed, vitamins and minerals? d. livestock parasiticides and medicines?		20		
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		No		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A-not applicable.

Submitted by Golden Temple & Yogi Tea companies 2545 Prairie Road, Eugene, Oregon 97405

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Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hum	ans or th	e enviro	
 Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3]. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)i]. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)]. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1]. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5]. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5]. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2]. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 	on hum	ans or the A	e enviro	OUR KNOWLEDGE
6517c(2)(A)i; § 6518 m.4].				
Category 2. Is the substance of the substance of the substance of the substance formulated or manufactured by a chemical process? [6502 (21)]. 2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]. 3. Is the substance created by naturally occurring biological processes? [6502 (21)]. 4. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)]. 5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)]. 6. Is there any alternative substances? [§ 6518 m.6]. 7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6]. Category 3. Is the substance compation. Category 3. Is the substance compation. Solution of sustainable agriculture? [§ 6518 m.7]. 3. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories:	Yes Yes		<u>.</u>	TO COPHEROIS ESSENT TO PRESENCE GRAW PRODUCT PRESUNESS EXTEND SHELF UPE SUPPLIENT QUENTITIES POSEMANY OIL DISTORT PLANON DROPLIES
a. copper and sulfur compounds; b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? d. livestock parasiticides and medicines? e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?	Yes	No	N/A ¹	Documentation (TAP; petition; regulatory agency; other)

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A—not applicable.

Submitted by Golden Temple & Yogi Tea companies 2545 Prairie Road, Eugene, Oregon 97405

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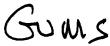
fax 541-461-1633 – Attn: Michael Gouveia, Product Development Manager

Documentation Question Yes No N/A1 (TAP; petition; regulatory agency; other) Category 1. Adverse impacts on humans or the environment? TO THE BEST OF Is there environmental contamination during manufacture, use, NO misuse, or disposal? [§6518 m.3]. OUR KNOWLEDGE Is the substance harmful to the environment? [§ 6517c(1)(A)(i); No 6517(c)(2)(A)i]. Does the substance contain List 1, 2, or 3 inerts? NO [§ 6517c(1)(B)(ii)]. 4. Is there potential for detrimental chemical interaction with other NO materials used? [§ 6518 m.1]. 5. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5]. 6. Are there detrimental physiological effects on soil organisms, NO crops, or livestock? [§ 6518 m.5]. 7. Is there a toxic or other adverse action of the material or its break-NΟ down products? [§ 6518 m.2]. 8. Is there undesirable persistence or concentration of the material or NO breakdown products in environment? [§6518 m.2]. 9. Is there any harmful effect on human health? [§6517c(1)(A)(i); 6517c(2)(A)i; § 6518 m.4]. Category 2. Is the substance essential for organic production? 1. Is the substance formulated or manufactured by a chemical proc-YE5 ess? [6502 (21)]. 2. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]. 3. Is the substance created by naturally occurring biological processes? [6502 (21)]. 4. Is there a wholly natural substitute product? [§6517c(1)(A)(ii)]. 5. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)]. 6. Is there any alternative substances? [§ 6518 m.6]. 7. Is there another practice that would make the substance unnecessary? [§ 6518 m.6]. Category 3. Is the substance compatible with organic production practices? 1. Is the substance consistent with organic farming and handling? YES [§ 6517c(1)(A)(iii); 6517c(2)(A)(ii)]. 2. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7]. 3. Is the substance used in production, and does it contain an active NO synthetic ingredient in the following categories:

Question	Yes	No	N/A1	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds;		100		
b. toxins derived from bacteria;		No		
c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals?		No	-	
d. livestock parasiticides and medicines?		NO	1 1	
e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		No		

¹ If the substance under review is for crops or livestock production, all of the questions from 205.600(b) are N/A-not applicable.

Submitted by Golden Temple & Yogi Tea companies 2545 Prairie Road, Eugene, Oregon 97405



Question	Yes	No	N/A 1	Documentation (TAP; petition; regulatory agency; other)
Category 1. Adverse impacts	on hum	ans or th	e enviro	· · · · · · · · · · · · · · · · · · ·
 Is there environmental contamination during manufacture, use, misuse, or disposal? [§ 6518 m.3]. Is the substance harmful to the environment? [§ 6517c(1)(A)(i); 6517c(2)(A)i]. Does the substance contain List 1, 2, or 3 inerts? [§ 6517c(1)(B)(ii)]. Is there potential for detrimental chemical interaction with other materials used? [§ 6518 m.1]. Are there adverse biological and chemical interactions in agro-ecosystem? [§ 6518 m.5]. Are there detrimental physiological effects on soil organisms, crops, or livestock? [§ 6518 m.5]. Is there a toxic or other adverse action of the material or its breakdown products? [§ 6518 m.2]. Is there undesirable persistence or concentration of the material or breakdown products in environment? [§ 6518 m.2]. Is there any harmful effect on human health? [§ 6517c(1)(A)(i); 6517c(2)(A); § 6518 m.4]. 	s on num	20000000000000000000000000000000000000	e enviro	OUR KNOWLEDGE
Category 2. Is the substance	essentia	for orga	nic proc	fuction?
 Is the substance formulated or manufactured by a chemical process? [6502 (21)]. Is the substance formulated or manufactured by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral, sources? [6502 (21)]. Is the substance created by naturally occurring biological processes? [6502 (21)]. Is there a wholly natural substitute product? [§ 6517c(1)(A)(ii)]. Is the substance used in handling, not synthetic, but not organically produced? [§ 6517c(1)(B)(iii)]. Is there any alternative substances? [§ 6518 m.6]. Is there another practice that would make the substance unnecessary? [§ 6518 m.6]. 	tes tes tes tes tes	20	~	THEE WATER EXTRACTED GUMS ARE BENGN AND A SIGNIFICATE MECHANIC PROPERTIES TO TEABLE INGREDIENTS, PACKATE
Category 3. Is the substance compat	tible with	organic	product	ion practices?
 Is the substance consistent with organic farming and handling? [§ 6517c(1)(A)(iii); 6517c(2)(A)(iii)]. Is the substance compatible with a system of sustainable agriculture? [§ 6518 m.7]. Is the substance used in production, and does it contain an active synthetic ingredient in the following categories: 	YES YES	No		GENDO IEA
Question	Yes	No	N/A¹	Documentation (TAP; petition; regulatory agency; other)
a. copper and sulfur compounds; b. toxins derived from bacteria; c. pheromones, soaps, horticultural oils, fish emulsions, treated seed, vitamins and minerals? d. livestock parasiticides and medicines? e. production aids including netting, tree wraps and seals, insect traps, sticky barriers, row covers, and equipment cleaners?		22222		

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